

August 26, 2015

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Mr. Gerard S. Poliquin

Secretary of the Board

National Credit Union Administration

1775 Duke Street

Alexandria, VA 22314

Dear Mr. Poliquin:

As a banker of more than forty years, I am becoming increasingly concerned about the expansion of commercial lending by credit unions. For over a century the credit union industry has served a useful purpose in providing consumer credit to members at very competitive interest rates.

The traditional role of banks in commercial lending is eroding with the advent of burdensome regulation and competition from non-traditional sources. If credit unions become commercial lenders they will most certainly take on risks that did not exist in the past. The blurring of the lines between commercial banking and credit unions could lead to a Congressional review of the industry's tax advantages. A level playing field for all commercial lenders is beneficial for the economy.

I urge you to curtail this expansive and unprecedented challenge to commercial banking.

Sincerely,

Albert M. Dashiell, Jr.

Senior Vice President